

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Keith Oshon COTTRELL

Case No.

Case: 2:21-mj-30491  
Assigned To : Unassigned  
Assign. Date : 10/19/2021  
Description: RE: KEITH OSHON  
COTTRELL (EOB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 18, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Possession with Intent to Distribute Controlled Substances.

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.



Complainant's signature

Bradley Cioma Special Agent, FBI

Printed name and title



Judge's signature

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: October 19, 2021

City and state: Detroit, MI

David R. Grand, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Bradley Cioma, being first duly sworn, hereby depose and state as follows:

**Introduction and Agent Background**

1. I am a Special Agent with the FBI and have been since May of 2017. I am assigned currently to the FBI Detroit Division's Strike Force Group 1. Prior to working at the FBI, I was a police officer for six years in Plymouth Township, Michigan. I have participated in training related to and conducted dozens of investigations of federal and state violations, including crimes of violence, firearms, and drug trafficking.

2. The statements contained in this Affidavit are based on my experience as a special agent, information provided by police officers, other agents of the FBI, and other law enforcement personnel, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through training and experience.

3. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

### **Probable Cause**

4. I am currently investigating Keith Oshon COTTRELL, date of birth xx/xx/1976, for violations of federal law, specifically, 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute Controlled Substances.

5. On October 18, 2021, Detectives from the Michigan State Police were observing the public areas of the Greyhound bus station in Detroit, Michigan. At approximately 12:45 pm passengers were boarding a bus that was headed from Detroit to the Southern part of the United States. A male entered the bus station carrying a black backpack and a red backpack. Upon walking into the station, the male looked in the direction of Detectives and immediately turned around and exited the bus station, walking outside and getting in a cab that was parked in front of the bus station. This behavior was suspicious to investigators because:

- a. The bus was already boarding;
- b. The individual arrived late, and a late arrival is a common tactic used by narcotics traffickers to limit their time to be observed by law enforcement;
- c. As the male arrived at the bus station, investigators observed him “fist bump” an individual in a gray Yukon prior to entering the bus station.

6. Detectives approached the male subject as he was sitting in the taxicab, and knocked on the side door of the cab. The male subject inside opened the door and was the sole occupant. Detectives advised the male that they watched him walk into the station and then once he saw them, he immediately walked out and advised the male that they found that behavior suspicious.

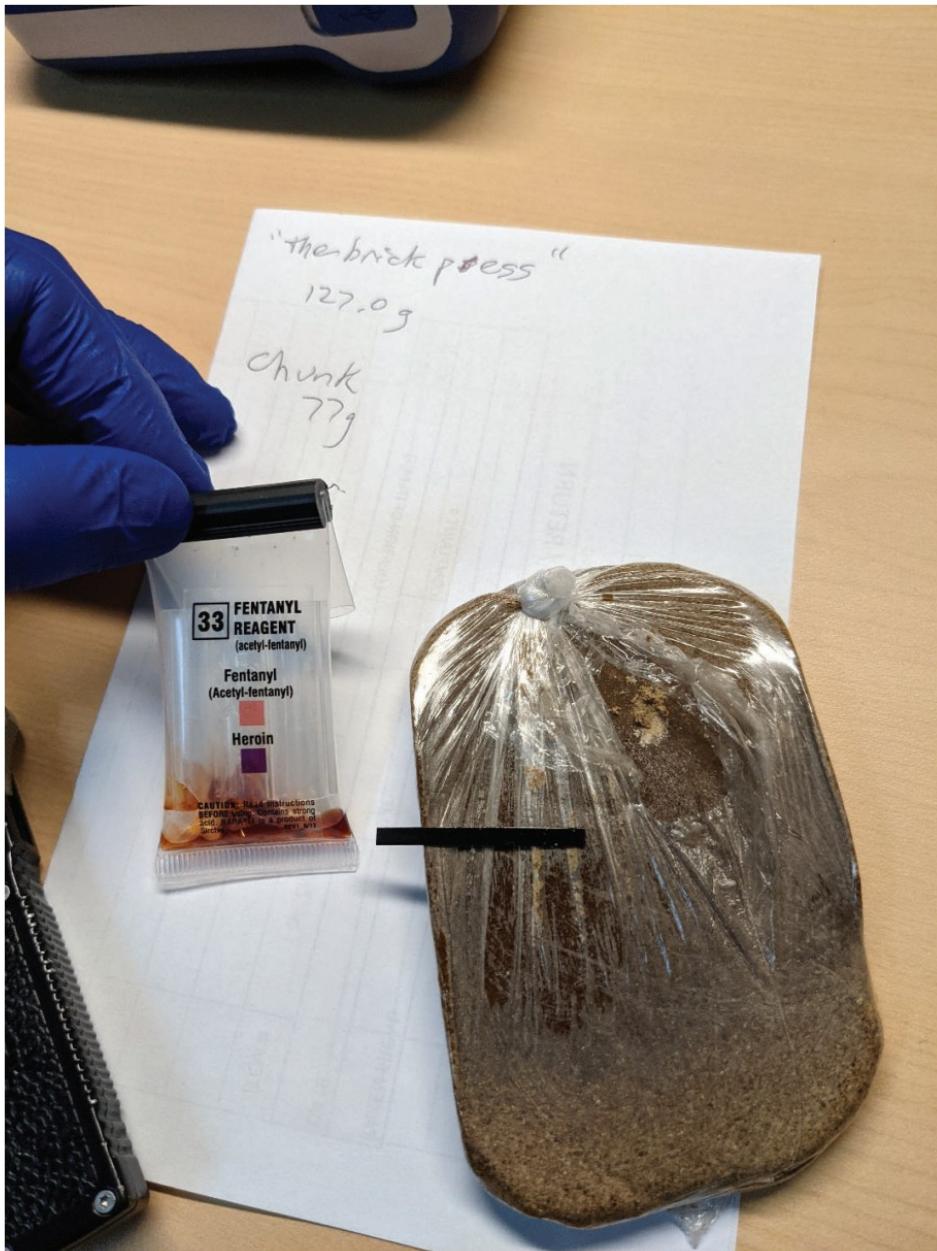
7. Detectives asked the man if he had an identification. The man provided one, and he was identified as Keith Oshon COTTRELL. COTTRELL was asked if he had any weapons on him. COTTRELL advised that he was carrying a knife. COTTRELL was asked if he had any drugs or weapons other than the knife, and he said “no.” Detectives asked COTTRELL if he would consent to have a K9 sniff his luggage. COTTRELL advised that he smoked weed yesterday and denied consent and advised unless he was under arrest he did not want the dog to sniff his bags.

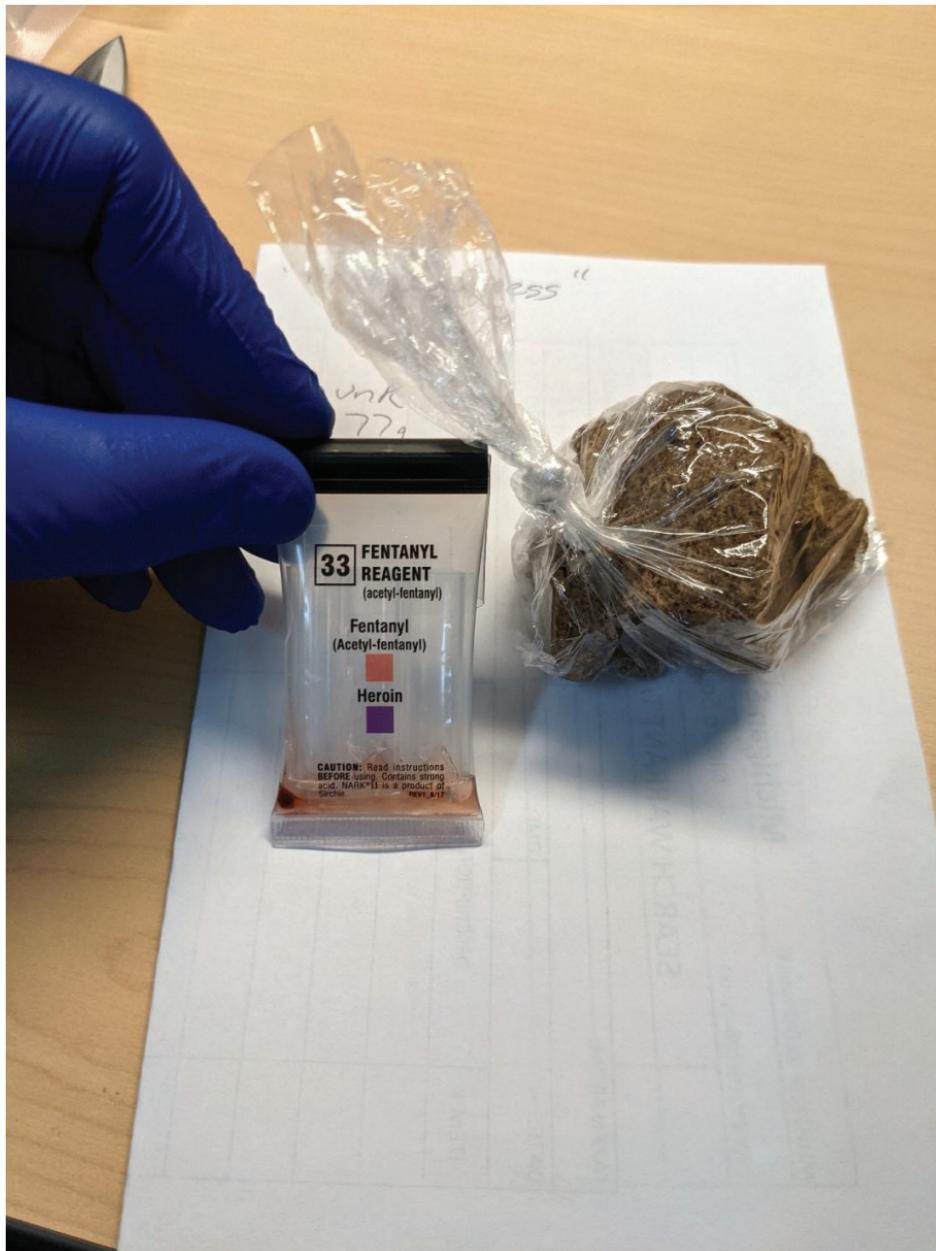
8. During this time, detectives ran COTTRELL through the Michigan Law Enforcement Information Network and discovered that COTTRELL had an active felony warrant for his arrest out of Wayne County, Michigan. COTTRELL was then placed under arrest.

9. Detectives asked the cab driver what COTTRELL said upon getting into the cab. The cab driver advised that COTTRELL got into his vehicle and told him to hurry up and drive away.

10. A K9 officer was on scene and had its K9 perform a sniff of the black backpack and red backpack that COTTRELL was carrying on his person when he originally walked into the bus station. The K9 gave a positive indication for illegal narcotics on the bags. Both bags were searched and inside the black backpack was a large quantity of marijuana in a vacuum sealed bag and another plastic bag wrapped in duct tape with suspected illegal narcotics.

11. A Reagent test was done on the suspected illegal narcotics in the plastic bag wrapped in duct tape. There were two separate plastic bags duct taped together, both tested positive for fentanyl and together weighed approximately 204 grams. The suspected marijuana weighed approximately 153 grams. In my training and experience, this amount of illegal narcotics is not consistent with personal use, and is instead consistent with narcotics trafficking.





12. COTRRELL has the following prior felony convictions: January 1999

- Felony - Stolen Property- Receive and conceal in excess of \$100

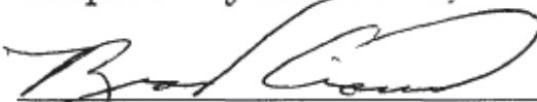
- February 1999 – Felony – Stolen Property – Receive and conceal in excess of \$100

- November 2012 – Felony – Control substance – sell – distribute – or dispense (prison time 30 months, supervised release 36 months)

**Conclusion**

13. Based on the above information, probable cause exists to believe that Keith Oshon COTTRELL, violated 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute Controlled Substances.

Respectfully submitted,

  
\_\_\_\_\_  
Bradley Cioma, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

  
\_\_\_\_\_  
Honorable David R. Grand  
United States Magistrate Judge

Dated: October 19, 2021